

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Tyrone Kachemare

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

~~W. H. K. A. D. Corp.~~ W. H. K. A. D. Corp.

COMPLAINT

Jury Trial: ☒ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name

Street Address

County, City

State & Zip Code

Telephone Number

Mr. Tyrone Kachemare
2421 S. 9th St.
CAMDEN COUNTY
NEW JERSEY 08101
856-993-0016

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name CITY OF CAMDEN
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 2

Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 3

Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 4

Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions ☐ Diversity of Citizenship
☒ U.S. Government Plaintiff ☐ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue?

14th / 15th AMENDMENT OF THE U.S.
CASE FILES

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship

United States

Defendant(s) state(s) of citizenship

United States / corporate comm Hll p

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur?

IN THE VITE AID

clone / pharmacy dept.

B. What date and approximate time did the events giving rise to your claim(s) occur?

July 19th

2019 2-300 in the afternoon

C. Facts:

THAT WHILST BEING AN client / consumer

What happened to you?

IN THE VITE AID STORE ON BROADWAY IN CAMDEN, I bring my script at the pharmacy dept (a) unknown individuals contacted me in a negative fashion / although my reply was in the positive it angered or frustrated the unknown associate. The much larger person exclaimed to the other loudly, how wait till we get outside and he then proceeded to walk down the aisle towards outside of the vite aid.

Who did what?

NO JUST THOSE (a) unknown persons who seemed to either been hanging out, lingering or just wait for pickup or any other person / whether the intent was robbery etc.

Was anyone else involved?

Who else saw what happened?

THIS IS MY MAIN ISSUE at least (a) of 3 pharmacy workers both heard & witnessed the incident and security to no notice with security monitor,

no respect to the discipline / nor were they summoned &

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

prior to the stabbing into / directly 3-4 inches into the back I was petrified inside on the grounds of Rite Aid / the incident inside of Rite Aid // the injuries I sustain due to Rite Aid (NOT) taking the correct steps / protocol of an ongoing provoked incident had me minutes from losing my life / lost of 24lb of blood in the hospital a month therapy & and operative continuing pain and relief that no longer produce blood and on 12-6 medication per day

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

I seek the amount of \$1.5 million as well as \$300,000 in punitive damages based on the activities and wait till we get outside was sufficient for the cooking of aid as protection of 12nd customer esp. disabled & senior citizens / their negligent becomes intentional / had they acted properly the forbearance of the incident (would not occur)

THAT TO \$1.5 million
COMPENSATION & \$300,000 FOR
PUNITIVE DAMAGES FROM RITE AID
CORPORATION

I declare under penalty of perjury that the foregoing is true and correct.

Signed this may day of 11th, 2021.

Signature of Plaintiff Tyler Leckemack

Mailing Address 2021 S. 9th St

Telephone Number 506 993 0248

Fax Number (if you have one) _____

E-mail Address tylerleckemack@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: Tyler Leckemack